BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company To Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design. (U 39 M)	Application 06-03-005 (Filed March 2, 2006)

SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E) COMMENTS ON THE RATE DESIGN ISSUES DESCRIBED IN THE AUGUST 22, 2007 SUPPLEMENTAL SCOPING MEMO AND ASSIGNED COMMISSIONER'S RULING UPDATING ISSUES LIST, SCHEDULE, AND CATEGORIZATION

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A. INTRODUCTION

Pursuant to Commissioner Chong's August 22, 2007 *Supplemental Scoping Memo and Assigned Commissioner's Ruling updating Issues List, Schedule and Categorization* (Scoping Memo), San Diego Gas and Electric Company (SDG&E) submits the following comments on the Rate Design section of the issues presented in Attachment A of the Scoping Memo. In submitting these comments, SDG&E acknowledges the effort that the Demand Response Resource Center (DRRC) has made in tackling the difficult task of establishing broad, overarching policy guidance for dynamic pricing issues. The subject of rate design is innately complex, and even more so when competing economic, social and public policy goals are at stake. The DRRC report has done an excellent job in summarizing and highlighting the competing objectives of economic efficiency and customer equity.

B. BACKGROUND

SDG&E has long been a supporter of the Commission's goal of implementing dynamic pricing, as evidenced by SDG&E's pending implementation of its advance metering infrastructure (AMI) program and SDG&E's most recent General Rate Case (GRC) Phase 2 rate

design filing. In the GRC Phase 2 rate filing, SDG&E proposes both residential and commercial and industrial (C&I) dynamic rates. For residential and small commercial customers (i.e. customers with demands < 20 kW), SDG&E proposes the Peak Time Rebate rate (PTR). SDG&E also proposes time-of-use rates for the small commercial customers, who are currently served under flat seasonal rates. For medium and large commercial and industrial customers, SDG&E proposes a default critical peak pricing (CPP) tariff. These rate design proposals were intended to provide greater price transparency in an effort to promote economic efficiency. Providing customers with the appropriate price signals encourages demand response during the periods of high system demands and investments in energy efficiency consistent with the Commission's energy action plan (EAP) goals and objectives. SDG&E also proposes a "roll-off" of AB1X rate caps, which is likewise consistent with the Commission's and SDG&E's goal of moving towards cost-based rates and the elimination of intra-class and inter-class cross subsidies.

C. SDG&E's POLICY OBJECTIVES REGARDING MEANINGFUL AND SOCIALLY RESPONSIBLE DYNAMIC RATE DESIGN

SDG&E supports the revised policy objectives as outlined in the DRRC report[1]. While the work completed to date by the DRRC is somewhat limited with respect to specific dynamic rate design issues, this shortfall does not limit the appropriateness of the policy conclusions. In approaching the development of dynamic pricing rate options, the focus should ultimately start with the goals to be achieved. In developing the rates, tradeoffs need to be considered with respect to items such as: risk versus rewards, efficiency versus equity, and short-term versus long-term objectives. The DRRC does not address all of the possibilities nor should it, as each utility should explore the details of dynamic pricing rates within each utility's unique rate design proceeding. Ultimately, in the development of dynamic pricing options the Commission should seek flexibility in rate design and rate structures within the context of the individual utility's operational and customer characteristics and changing circumstances.

With respect to the CARE rate and other social programs that are subsidized, the DRRC report recommends the following:

[1] That is, to promote economic efficiency, promote equity, facilitate customer choice and clearly and simply communicate prices and costs. *See* pages 35 to 38, *Rethinking Rate Design: A survey of leading issues facing California's utilities and regulators*, draft report, p. , Ahmad Faruqui and Ryan Hledik of the Brattle Group, and Bernie Neenan of Utilipoint, prepared for the Demand Response Research Center, August 7, 2007.

"The California commissions should reassess the logic of such [current] rates and quantify the loss in economic efficiency they create. As a first step, they should quantify the extent of subsidy inherent in such rates." [2]

"Particularly, subsidies created by electricity discounts for low income customers, subsidies embodied in non-time varying rates, and the multitude of problems created by AB1X should be dealt with as first steps in moving toward better rate design."[3]

While the DRRC references the CARE rate, the DRRC recommendation applies to general cross subsidies currently embedded in legacy ratemaking. As a matter of social and public policy, SDG&E agrees that a need to provide assistance to specific customer groups exists. However, SDG&E believes that even these customers should be provided with the appropriate price signals and that, if at all possible, all customers should know or see the explicit subsidy being provided. Providing all customers the appropriate price signals will educate customers and allow for economic decisions with respect to managing overall energy costs. In addition, explicit charges in utility bills that identify the extent of subsidies and public purpose programs will provide a more informed public discourse over the tradeoffs between economic efficiency and equity objectives.

Thus, SDG&E believes that the Commission should initially focus on the development of policy objectives consistent with those identified by the DRRC to provide guidance in the development of dynamic rates. The specifics of the actual rate designs, however, should be evaluated against these policy objectives on a case-by-case basis within the context of each utility's on-going rate design proceedings and should be customized to meet the needs of each utility's unique customer composition. With respect to dynamic rates, policy unification is desirable, but a "one size fits all" approach for implementation across all utilities and all customer segments may not be feasible.

D. SDG&E's COMMENTS REGARDING THE TEN ISSUE CATEGORIES LISTED IN ATTACHMENT A

[2] Ibid, p. 36.
[3] Ibid. p.39.

I. Objectives of Dynamic Pricing and Time Differentiated Rates

The objective of dynamic pricing and time differentiated rates (TDRs) should be to provide customers price signals that more accurately reflect the cost of power (energy and capacity) and that allow customers to make more informed economic decisions with respect to their energy usage. However, if societal goals and objectives are not decoupled from rates, these price signals will be distorted by the continuance of "hidden" subsidies.

Providing price transparency will lead to greater economic efficiency in the market through the efficient allocation of resources, and will provide the appropriate economic incentives to curtail usage during "critical peak" periods, thus avoiding potential future investments in energy generation infrastructure. However, achieving true price transparency will require that inequities, which are currently contained within rates in the form of "hidden" subsidies, be mitigated. Facilitating the removal of "hidden" subsidies will require that societal goals and objectives be decoupled from rates in order to allow customers to receive appropriate price signals. Societal goals and objectives, while noteworthy, should be addressed through specific programs that provide the required relief desired for specific customer segments directly, and not through the distortion of rates and corresponding price signals (e.g. Low Income Home Energy Assistance program (LIHEAP) is a program that provides direct income transfers for payment of energy bills without changing the energy rates or price signals).

While a straight discount (e.g. CARE) reduces, from the customer's perspective, the cost of energy as compared to other expenses customers incur, the value of the discount is likely limited to the degree that the energy expense is a significant portion of the customer's disposable income. Thus, programs such as LIHEAP provide an effective alternative approach to providing customer discounts while not distorting the customer's price signal.

Dynamic pricing and TDRs offer a broad spectrum of rate options that should provide utilities with the flexibility required to address both short-term and long-term objectives. For example, specific rate designs are available that can be utilized to address short-term supply needs either on a day-ahead or day-of basis (e.g. critical peak pricing). These rates provide that opportunity for short-term benefits, however, they may not provide a sound basis for encouraging long-term investments by customers in areas such as energy efficiency. Thus, in developing dynamic pricing and TDRs, the policy objectives of the Commission's Energy

Action Plan (EAP), rate design principles, as stated in the DRRC report,[4] and the interest of different parties should be balanced on a case-by-case basis. To try and rank the competing policy objectives will likely lead to frustration since compromises will ultimately need to be made. The trade-offs between the various goals and objectives are not likely to be systematic and/or constant over time.

II. Rate Options

The variety of dynamic pricing and TDR options that can be offered by the various parties should vary based on customer characteristics, customer classes and available metering and innovative technologies. While customers should have options available, ultimately each customer class should have a default dynamic or TDR rate.

The level of sophistication and complexity of specific dynamic price signals should vary with the value of the information provided in that price signal to the customer. In other words, the value of a price signal will depend on the customers' ability to understand the rate structure, ability to receive the price signals, and ability or capability to act upon the information. Therefore, dynamic rates should be designed in such a fashion such that a particular price signal can be provided to the customer with little or no transactions cost, and the information content embedded in such a price signal achieves corresponding behavioral actions that allow customers to manage their energy usage and resulting energy bills.

To achieve the goals envisioned by the Commission in the EAP, the utilities must be given the flexibility to offer a wide range of rate options. In implementing dynamic pricing and TDRs, the Commission should strive to provide opt-out alternatives that provide trade-offs between risks and rewards. On the other hand, too many options may lead to diminishing returns as customers will select the rate option that provides the lowest bill with the least amount of change (i.e., the structural benefitter issue). In the case of a structural benefitter, demand response and other potential benefits will be minimized since customers will not necessarily provide demand response to achieve bill savings benefits.[5] To ease customer resistance to the implementation of dynamic pricing and TDRs, customers can be offered bill protection during a transition period. Transitional bill protection allows customers to "test drive" the new rates and

[4] See footnote 1.

[5] In these instances, "flatter" rate options should reflect the correct level for the hedging premium when customers elect to opt-out to alternative rates.

have a period to adjust behavior or operations to achieve sustained bill savings and contribute to the Commission's goals and objectives.

III. Components of Dynamic Pricing Tariffs

The individual components should reflect sound rate design principles that align cost recovery with cost causation.

To the extent that costs are incurred based on fixed investments (e.g. distribution services, lines, transformers, etc…), these costs should be recovered through fixed charges, such as demand charges and basic service fees. To the extent the costs are variable in nature then these costs should be recovered through variable charges (i.e. energy rates). Whether fixed or variable, the degree of time differentiation associated with the incurrence of costs should be reflected in the dynamic or TDR design.

Designing dynamic pricing and TDRs on a "cost causation basis" will encourage the price transparency that these types of rates should ultimately strive to achieve. However, the level of granularity and the degree of time differentiation should depend upon the context of the specific rate and customer segment receiving the price signal. As previously noted, dynamic pricing and TDRs can take many forms and address a spectrum of both short-term and long-term objectives. Thus, a "one-size fits all" approach in designing these types of rates is neither reasonable nor optimal. In addition, not all rate components will need to be time-differentiated. For instance, public purpose programs and nuclear decommissioning costs are not time-differentiated cost components.

To the extent that the distribution portions of the rate components are time-differentiated then both Direct Access (DA) and Community Choice Aggregation (CCA) customers will participate in dynamic pricing through the distribution and transmission cost components. However, if Energy Service Providers (ESPs) and Community Choice Aggregators do not offer dynamic pricing or TDRs, a significant portion of the costs incurred will not be captured on a time differentiated basis. Today the commodity portion of customers' rates accounts for over 50% of the total rate. Customers must have the opportunity to select a rate option that best fits their risk profiles, whether it is offered by the utility or through a third-party provider.

IV. Recovering the Revenue Requirement

Designing dynamic pricing and TDRs on a "cost basis" will allow rates to communicate the appropriate price signals to customers while recovering the revenues associated within the appropriate customer class.

In recovering the revenue requirements associated with dynamic pricing and TDRs, the rate options should be designed based on the revenue requirement associated with the class of customers eligible to take the dynamic pricing or TDR rate options.[6] That is, all rate options offered to a particular class of customers (e.g. C&I) should be based on the same revenue requirement. Otherwise, if separate revenue requirements are established for rate options within a particular class of customers, the utility will face customer migration issues. To the extent that customers are able to migrate to multiple tariffs and the revenue requirements associated with each tariff are different, customers will likely switch rates when it is advantageous based on whether an available rate option is either higher or lower than the customer's current rate. Additionally, the rate relationships among the various dynamic pricing and TDR rate options should be maintained because over and under collections are recovered through rate adjustments. If these rate relationships are not maintained on a consistent basis, the utility will again likely face customer migration issues. Thus, in recovering over and under collections associated with dynamic pricing and TDRs, adjustments must be applied to all rates for which the customer class is eligible.

With regard to cost recovery of over and under collections, some effort should be made to identify those costs that should be retained within a particular dynamic pricing customer class. Currently, the Energy Resource Recovery Account (ERRA) allocates over or under collections costs to all customer classes based on an equal percent of generation costs. Thus all customer classes share in the recovery of all over and under collections. While not all over and under collections will be able to be tracked, to the extent possible cross subsidies between customer classes should be mitigated. In addition, the incorporation of demand elasticities, while not required, would likely help reduce potential over and under collections.

V. Hedging

Today all rates reflect an implicit hedging cost. With the introduction of the 15% reserve margin requirement, utilities must procure additional resources to meet these reserve

requirements, thus the costs of these reserves are recovered through the ERRA account and shared by all customer classes.

The Commission may determine that a discount or participation premium is warranted due to the existence of hedging premiums in "flatter" rate designs, beyond that which is already included for reserves. In establishing rates that are lower than other rate options, as discussed above the issue of customer migration could be problematic. In other words, customers who choose a more static rate option (with price certainty) may pay a higher hedging premium, while customers who choose a more dynamic rate will receive a discount. In developing static rate options, appropriate level of hedging premiums must be considered.

VI. Sources of Triggers and Prices for Dynamic Rates

Triggers for rates like critical peak pricing (CPP), should reflect system conditions when demand is likely to cause a potential scarcity in supply. The establishment of customer reference levels for rates like two part real time pricing must accurately reflect the customer's load.

Scarcity can occur as a result of California Independent System Operator (CAISO) conditions within the state, high demand (i.e. system peaks) or system emergencies on the utilities' systems (e.g. fires). All of these situations should be considered in developing the respective triggers for CPP rates. With respect to developing CPP triggers for high or critical peak demand hours, the utility should be in a position to exercise discretion as to whether the CPP event should be called. In those instances where events would be triggered by the CAISO because of statewide conditions or local system emergencies, a suite of emergency or reliability programs should be offered. Nevertheless, the triggers should be defined within the purpose of the particular dynamic rate option (e.g. day ahead demand and supply balancing, same day real-time demand response, reliability and emergency conditions, etc.)

In developing two-part real-time-pricing (RTP) rates, the fixed portion should recover those costs that are currently recovered from customers on an aggregate basis. That is, the incremental portion of the two-part tariff should only reflect those costs that are truly incremental. Because cost recovery varies with energy usage, to the extent that some costs which appear incremental are included (e.g. nuclear decommissioning and public purpose programs), customers are likely to be discouraged to participate in a two-part rate. Thus, non-bypassable charges should be recovered from the fixed portion of the rate. Recovering these

[6] The revenue allocations also should reflect some degree of cost causation.

costs in this manner will also avoid the potential conflicts with prior Commission decisions which established the cost recovery method associated with these costs. In addition to the non-bypassable charges, other non-incremental costs, such as transmission and distribution and the fixed portion of generation costs, should also only be collected from the fixed portion of the two-part rate.

The establishment of a customer baseline method has been discussed in multiple venues and proceedings for the purposes of determining the usage eligible for demand credits (e.g. peak time rebates) and establishing of baselines for measurement and evaluation of demand response benefits. In determining the appropriate customer baseline, the Commission must ensure that the established baseline provides for cost recovery of those costs allocated to the customer class. Otherwise, the introduction of two-part tariffs is likely to lead to cross-subsidization and cost shifting among the customer classes. However, the level of complexity has proven problematic in the establishment of the appropriate method for calculating customer reference levels. Differing views on issues like determining the appropriate measurement timeframe, the need for periodic updates and weather normalization have created obstacles to achieving consensus among the parties. Ultimately, whatever the resulting baseline calculation, the Commission must ensure that the baseline accurately reflects the customer's load. In those instances where customers' expand their operations, these expansions should not be priced at only the incremental rates.

VII. Residential Rate Issues

Until AB1X restrictions are lifted, dynamic rates are primarily limited to rebate programs (e.g. PTR) or an overlay that allows the first two tiers to remain unchanged. Accordingly, such programs should be viewed only as transitional, and not as a substitute for the long term goal of exploring dynamic rates.

The types of dynamic pricing and TDRs that can be offered to residential customers are limited under the current AB1X restrictions. While other dynamic pricing and TDRs excluding AB1X restrictions can be offered, they can be offered only on a voluntary basis and thus will likely only be selected by customers that are "structural benefitters". For these types of rates to

be offered on a default basis applicable to all residential customers, the AB1X restrictions need to be lifted.

Limiting residential customers to rebate type programs reduces the potential demand reductions that can be achieved from this customer class on a long-term basis. First, rebate programs are primarily designed to focus on short-term needs by providing credit in response to "critical peak" events. Thus, customers are not provided longer-term incentives (i.e. price signals) to make economic investments in appliances or technology that would put downward pressure on the need for future capacity investments.

Secondly, while the current tiered rates provide incentives to larger-use customers to reduce usage, the conservation signal provided does not reflect any element of time. That is, customers are only encouraged to use less, they are not encouraged to use less during the utility's on-peak periods. In addition, those customers using less than 130 percent of baseline (AB1X protected usage) receive no price signal to encourage conservation as these rate are capped. This is also true for low-income customers under CARE. As previously discussed, the customer may value the rate discount less than the customer would value the same assistance decoupled from the rate, and over time the discount buried in the rate will not be viewed as a discount but as an entitlement. While recognizing the need to provide support for this customer segment, these customers should still be provided the appropriate price signals to encourage the same opportunities to invest in ways that will help these customers manage their energy usage.

In addition to the price signal problems addressed above, rebates do not address the fundamental inequities created by the current AB1X restrictions. PTR rebates should be viewed only as transitional, not as a substitute for dynamic rates and the long-term goal of moving towards dynamic rate options.

In the absence of dynamic pricing and TDRs, programs such A/C cycling have been offered as a way to address those residential end-uses that have the most direct impact on the overall system peak. While programs that target specific customer end-uses are effective, these types of programs do not encourage customers to make behavioral changes that have longer term benefits. Moreover, the utility is providing control as compared to customer control for energy use. Thus, success of the programs is largely based on the size of the incentives provided through the program, with the hope that a sufficiently large incentive will prevent customers from exiting the program.

VIII. Critical Peak Pricing

CPP rates should accurately reflect costs and encourage strategic demand response. The triggers that implement CPP rates should be based on critical system conditions.

Critical peak pricing (CPP) is but one form of dynamic pricing. CPP rates should be developed such that the rates employed during CPP events reflect generation capacity and energy costs. These rates should be developed based on the utility's marginal cost estimates as a proxy for market prices. Developing rates in this manner should provide sufficient price differentials between CPP and non-CPP periods to encourage customer demand response. Other elements such as a capacity reservation charge (CRC) could also be included in the CPP rate design to provide customers the opportunity to manage their potential bill impacts. Under the capacity reservation charge, customers would be able to limit the amount of potential load that could be exposed to the higher CPP period rates. Thus, the CRC represents a hedging mechanism for CPP customers. Providing customers with the ability to control bill impacts should make these types of rates more acceptable leading to greater demand response potential. In addition, the CRC provides the utility with the ability to capture a portion of the generation capacity costs through a fixed charge. Recovering capacity costs in this manner allows the CPP rate to be designed for a variable number of event days, while still allowing the utility to manage the recovery of the revenue requirement.

Triggers for CPP rates should reflect critical system conditions, whether at a state level (CAISO), the utility level due to higher demands, or when system emergencies warrant it. CPP periods should be determined based on the utility's system characteristics. Customers have argued in the past for shortened time periods since not all customers have the ability to curtail load for a significant period of time. However, if the shorter CPP period merely shifts the utility's system peak rather than actually lowers the utility's system peak, demand response benefits are not realized even though customers receive lower bills.

IX. Relationship to Reliability-Oriented and Other Demand Response Programs

The introduction of dynamic pricing and TDRs should not preclude customers from the opportunity to participate in other demand response programs.

The key element in allowing demand response program participation is to ensure that the customers are not receiving a "double credit" for the same demand reduction. This problem can be addressed by establishing a hierarchy for participation. For example, if a customer is on a

CPP rate and is also participating in demand response programs, when a CPP event is called the customer is not eligible to participate in the demand response program on that day. However, on those non-CPP days the customer would be eligible to participate. For example, during a non-CPP event day, the customer could participate in a same day or real-time demand response/reliability program.

X. Timing of Tariff Development and Roll-Out

The timing of tariff development should coincide with the utility's general rate case or rate design window. This forum will provide all parties an opportunity to discuss and debate the advantages and disadvantages of potential rate designs.

Rates for individual customer classes should be developed with the policy principles outlined in the draft DRRC report which include (1) promote economic efficiency, (2) promote equity, (3) facilitate customer choice and (4) clearly and simply communicate prices and costs. Dynamic pricing and TDRs should be explored and implemented in conjunction with the implementation of the advanced meter infrastructure (AMI). Prior to actually implementing any of these new rate structures, sufficient funding for customer education is necessary to ensure that customers are informed and able to take full advantage of the proposed rate designs. In addition, to increase customer acceptance, bill protection can be offered as a way to transition from the legacy rates to the new dynamic rates.

E. CONCLUSION

As discussed herein, SDG&E respectfully requests that the Commission consider SDG&E's comments when formulating dynamic pricing policy.

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Respectfully Submitted,

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October 5, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E) COMMENTS ON THE RATE DESIGN ISSUES DESCRIBED IN THE AUGUST 22, 2007 SUPPLEMENTAL SCOPING MEMO AND ASSIGNED COMMISSIONER'S RULING UPDATING ISSUES LIST, SCHEDULE, AND CATEGORIZATION** on each party named in the official service list for proceeding A-06-03-005 by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Rachelle B. Chong and assigned Administrative Law Judge David K. Fukutome.

Executed this 5th day of October, 2007 at San Diego, California.

/s/ Susan A. Long
Susan A. Long

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: A0603005 - PG&E - TO REVISE ITS
Filer: PACIFIC GAS AND ELECTRIC COMPANY (U39E)
List Name: LIST
Last changed: September 25, 2007

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